

May 28, 2009

Ms. Alexandra T. Broomhead  
Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Broomhead:

The Oregon Republican Party is in receipt of your Request for Additional Information dated May 8, 2009, concerning our amended 2008 30-Day Post-Election FEC report.

With respect to the receipt from ORRINPAC: the party obtained a redesignation from the donor on 12/24/08 which was within 60 days of the 10/28/08 receipt. The Party transferred \$ 5,000 to our non-federal account on 1/15/09, and itemized this transfer on our February 2009 monthly report.

The Party has reviewed the contributions from Wes LeMatta. We received a \$ 200 Line 12 transfer memo receipt on 10/8/08, which was reported on our 12-Day Pre-General report. We also received a \$ 6,500 Line 12 transfer memo receipt on 10/22/08, as itemized on this 30-Day Post-General report. Thus, the \$ 6,700 year-to-date aggregate listed on this report is correct.

We have reviewed all memo-entries supporting the transfers itemized on Line 12. The memo-entries from Making Business Excel PAC ( \$1,875), Heartland Values PAC (\$5,000), 3M Company PAC (\$ 357.15), Truth Accountability & Courage PAC (\$ 2,500), 21st Century Majority PAC (\$ 5,000), Leadership Circle PAC (\$ 2,500), Womble Carlyle PAC (\$ 125), and Defend America PAC (\$ 5,000) are in support of the \$ 23,000 transfer from the Special Teams 2008 joint fundraising committee. All other memo-entries on this report support the transfers from the Gordon Smith Victory Committee joint fundraising committee.

The payment of \$ 31,040 on 10/29/08 from the Levin account to Arena Communications referenced in your letter was for the non-federal (Levin) share of a generic get-out-the-vote mailing that did not reference any federal candidate and did not urge the support or defeat of any federal candidate. The federal account paid \$ 17,460 on 10/29/08 for this mailing, as disclosed on our 30-Day Post-General report. Therefore, this allocable expenditure totaling \$ 48,500 was paid using the appropriate percentages from the Levin account (64%) and from the federal account (36%), and no impermissible funds were used to pay for allocable Federal Election Activity.

The Party has reviewed the transfers received from the National Republican Senatorial Committee and from the Republican National Committee, and all payments made for "Volunteer-exempt brochures" and "Volunteer-exempt yard signs" as referenced in your letter. These payments were not for public advertising, and neither the campaign materials nor the mailings were distributed by direct mail (i.e., by a commercial vendor or from commercial lists). All mailings were prepared by volunteers and all distribution of campaign materials was done by volunteers. All funds used for the activities were permitted under the Federal Election Campaign Act, as amended. None of the funds used were designated for a particular candidate, and no payments for the activities were made using any transfers-in received from the RNC or from any national party committee.

Therefore, these disbursements met the Commission's requirements as exempt from the definition of a contribution or expenditure on behalf of any specifically identified federal candidate. The payments are correctly itemized on Schedule B for Line 30b, and do not require a Schedule E or Schedule F for Lines 24 or 25.

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The Party has filed an amended 2008 30-Day Post-General monthly report to reflect that the Schedule H3 transfers from our non-federal account came from the Oregon Non-Fed State Account c/o Key Bank.

The Party has filed an amended 2008 30-Day Post-General report with additional memo-itemizations regarding the reimbursements to individuals disclosed on Schedule H4.

The Party has reviewed the disbursements reported on Line 21b that were described as "List rental-OR GOP". These expenditures were for Party fundraising purposes, and were not expenditures for Voter Identification, Generic Campaign or Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appeared on the ballot (and thus do not qualify as Federal Election Activity). As Party fundraising expenditures, these payments are properly itemized on Schedule B for Line 21b.

Sincerely,

Dennis Morgan  
Treasurer

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